

From: [Jennifer Gaines](#)
To: Gaines.jennifer@epa.gov
Subject: Fw: rodenticide risk mitigation decision
Date: 05/31/2012 10:11 AM

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)

Tel: 703 305-5967
Fax: 703 305-6309

----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/31/2012 10:10 AM -----

From: Russell Wasem/DC/USEPA/US
To: Chindi Peavey <cpeavey@SMCMAD.ORG>
Cc: Kathryn Jakob/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA
Date: 03/17/2011 08:36 AM
Subject: Re: rodenticide risk mitigation decision

Hello Chindi,

The 50 foot restriction applies to all above ground placements of commensal use rodenticides made from 1st generation anticoagulants, 2nd generation anticoagulants, and non-anticoagulants (bromethalin, cholecalciferol (Vit.D3), and zinc phosphide). All outdoor above ground placements of commensal use rodenticides must be in a bait station. We consider a building to be a structure that has walls and a roof.

Below ground sewer baiting is acceptable and in-sewer baiting does not require a baitstation. A sewer does not constitute a building and therefore to bait outside of a sewer line would require the presence of a building, within 50 feet, and a baitstation.

Please let me know if you have any further questions.

Regards,

Rusty_____

Rusty Wasem / Chemical Review Manager
Risk Management & Implementation Branch 1*
Pesticide Re-evaluation Division* / Office of Pesticide Programs
703 / 305 6979

▼ [Chindi Peavey ---03/16/2011 05:53:39 PM---Hello Randy, I have a question about the new risk mitigation decision on rodenticides. Does the sec](#)

From: Chindi Peavey <cpeavey@SMCMAD.ORG>
To: Russell Wasem/DC/USEPA/US@EPA
Date: 03/16/2011 05:53 PM
Subject: rodenticide risk mitigation decision

Hello Randy,

I have a question about the new risk mitigation decision on rodenticides. Does the section about rodenticides only being allowed within 50 feet of a building apply to all rodenticides, or only the single feed, second generation anticoagulants? Can the older multiple feed anticoagulants be used in municipal baiting programs in bait stations farther than 50 feet from a building? And what about the new organically certified bait Terad (active ingredient vitamin D3)? Can that be used in stations farther than 50 feet from a building? If not, how does the EPA propose that cities conduct municipal baiting programs outside of sewer lines?

Thanks,

Chindi Peavey, PhD